

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JAMES MCGIBNEY, an individual; and
VIA VIEW, INC., a corporation.

Plaintiffs,

v.

CASE NO. 5:14-cv-01059-BLF

THOMAS RETZLAFF, an individual;
NEAL RAUHAUSER, an individual;
LANE LIPTON, an individual;
and DOES 1-5, individuals whose true
names are not known,

Defendants.

**DECLARATION OF DENISE HOLLAS IN SUPPORT OF DEFENDANT THOMAS
RETZLAFF**

I, Denise Hollas, am a witness in this matter, and I declare the following:

1. I am over the age of 18 years and am not a party to this action. I have personal knowledge of the facts stated in this declaration, and, if called as a witness, could and would testify competently to the truth of the facts as stated herein.
2. I have known the defendant Thomas Retzlaff for the past 38 or so years, since we first met at around age 10 in our hometown in Minnesota. We married in 1987 and have two children together. We have been divorced for about 16 years and have remained good friends, talking to one another at least once a day and seeing each other at least once a week, if not more.

3. At around 12 noon (local time) on Thursday, August 28, 2014, I was at work at my desk when I received a telephone call from plaintiff James McGibney. He told me if I were to change the declaration that I had earlier wrote for him on July 29, 2014, that I would be charged with perjury and would go to jail. About ten minutes later I received a telephone call at my work desk from an adult male who identified himself as "*Catty Idiot*". I recognize this alias as being a user name for a person on Twitter (@CattyIdiot, among many other aliases). This *Catty Idiot* person has also been posting numerous comments about Thomas on Twitter, calling him terrible names and making all kinds of ridiculous and untruthful allegations about my ex-husband, as well as threats against him and Thomas' family. I have seen these comments personally.

4. I do not know this *Catty Idiot* person and my work telephone number is a non-public number that very few people know about. Because of him calling me just a few short minutes after McGibney called me, I am certain that he got my number from James McGibney. The person known as *Catty Idiot* them proceeded to threaten me and warned me that I had better not do anything to help out Thomas in his lawsuit against McGibney. *Catty Idiot* told me that if I were to sign anything for Thomas that I would go to jail and would never see my daughter again.

5. This telephone call made me very scared because I know about all the harassment that Thomas has suffered from *Catty Idiot*, James McGibney, and McGibney's other internet friends (such as this twitter person @Captien_007). I also know about the harassment that Texas attorney Jeffrey Dorrell has suffered. I also know of the intimidation tactics used by McGibney in that he publicly claims to call up the employers of people involved in the Kate Gosselin TV personality controversy and that he tries to get people fired from their work. Because of this, I

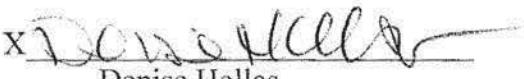
request protection by the court from further harassment and retaliation by the plaintiffs and those people allied with the plaintiffs.

6. At the time I signed the July 29th document, I was aware that a post had been made about me on McGibney's Cheaterville website and that McGibney had bought up a website in my name, the name of my son and daughter, and in Thomas' name – as well as the names of about 15 other people. I know that McGibney has been using these websites to harass and defame other people and I was scared that the same thing would happen to me. After signing the document I got the websites returned back in my name and in my son's name.

7. I want to make it absolutely, 100% clear here - I do not want to receive any more communications from James McGibney, his attorney Jay Leiderman or anyone else associated with the plaintiffs. I want nothing to do with this case and I will never testify on behalf of James McGibney or his company.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: 8-29-2014

x 
Denise Hollas